

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

KELLY M. BRENEISEN and DANIEL  
BRENEISEN, individually, and on behalf  
of all others similarly situated,

Plaintiffs,

v.

COUNTRYSIDE CHEVROLET/BUICK/  
GMC, INC.,

Defendant.

Case No. 2:21-cv-00412-LA

Honorable Judge Lynn Adelman

**PLAINTFFS' UNOPPOSED MOTION TO EXTEND TIME TO FILE RESPONSE TO  
DEFENDANT'S MOTION TO DISMISS**

**NOW COME** KELLY M. BRENEISEN and DANIEL BRENEISEN (“Plaintiffs”), by and through their undersigned counsel, and pursuant to Civil L.R. 7(h) moving this Honorable Court to extend the briefing deadlines pertaining to Defendant COUNTRYSIDE CHEVROLET/BUICK/GMC, INC.’S (“Defendant”) Motion to Dismiss, and in support thereof, stating as follows:

1. On March 31, 2021, Plaintiffs filed the instant case against Defendant seeking redress for Defendant’s alleged violations of the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. § 1681 *et seq.* [Dkt. 1]

2. On June 1, 2021, Defendant filed a Motion to Dismiss Plaintiff’s claims in their entirety (“Defendant’s Motion”). [Dkt. 10]

3. Pursuant to Civil L. R. 7(b) and (c), Plaintiffs’ response to Defendant’s Motion is due on or before June 22, 2021, and Defendant’s reply is due on or before July 6, 2021.

4. Due to other professional deadlines and a planned vacation for the undersigned, Plaintiffs are respectfully seeking a 21-day extension, through July 13, 2021, to submit their response to Defendant’s Motion.

5. Counsel for Plaintiffs conferred with Defendant's counsel about the relief sought herein, and Defendant has no objection provided that the deadline for Defendant's reply is extended through July 27, 2021, which Plaintiffs do not oppose.

6. The extension of time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation.

**WHEREFORE**, Plaintiffs respectfully request that the Court enter an order (1) extending the deadline for Plaintiffs to submit their response to Defendant's Motion through July 13, 2021, and (2) extending Defendant's deadline to submit its reply through July 27, 2021, and for any other relief this Court deems appropriate.

Dated: June 22, 2021

Respectfully submitted,

/s/ Mohammed O. Badwan  
Mohammed O. Badwan  
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**CERTIFICATE OF SERVICE**

I, Mohammed O. Badwan, certify that on June 22, 2021, the foregoing document was filed electronically using the Court's CM/ECF system, which will accomplish service on all counsel of record.

/s/ Mohammed O. Badwan